

EXHIBIT

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| In re Terrorist Attacks on September 11, 2001 | 03-md-1570 (GBD)(SN) ECF Case |
| This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i> | 15-cv-9903 (GBD) (SN) ECF Case |

DECLARATION OF PATRICK IMPERATO

I, Patrick Imperato, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.

2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.

3. On September 11, 2001, I was present in New York City when the terrorist attacks of the World Trade Center Towers occurred. Attached as Exhibit B to this Declaration is a true and correct copy of the World Trade Center Survivor List from the Library of Congress Web Archives, confirming my presence at Ground Zero at the time of these horrific attacks. At the time of these events, I worked as a Senior Technical Engineer at AMC Computers (formally known as "Word Pros"), located at 129 West 27th Street in New York City.

4. On the morning of 9/11, I had traveled towards the World Trade Center area on the E train as I had planned to attend a computer class on the 25th floor of the South Tower. As I exited the train near the North Tower at approximately 9:00 a.m., a police officer directed all

travelers to leave the station via a stairwell. I noticed that the concourse was dark and appeared to be closed. As I followed the directions from the officer and proceeded to the street level, I saw a crowd of people staring at the North Tower. I then looked up and saw a huge opening in the upper section of the building with thick black smoke rising above it. I heard people talking about the fire in the North Tower, but no one seemed to know the cause of the explosion. I then continued walking towards the South Tower by traveling by way of Vesey Street to Church Street, and then to Liberty Street.

5. As I arrived near the South Tower, I heard people shouting to get away from the building. I then looked up and watched in horror as the second passenger jet slammed into the South Tower, and a huge fireball ejected from the building. I could actually feel the heat from the fireball that blew out of the South Tower. As I then quickly turned to run away from the area, I fell to the ground and I was trampled by people fleeing the area, and I severely injured my left knee.

6. Despite my significant knee pain, I fled from the area in front of the South Tower as quickly as possible. A store owner let me use their phone so that I could call my wife. I also called my office to let them know that I had been injured but that I had survived the attacks at the World Trade Center. As I then limped away from the area and I arrived at Canal Street and 6th Ave, I watched as the South Tower collapsed. I just could not believe what I was witnessing. The scene looked like a war zone.

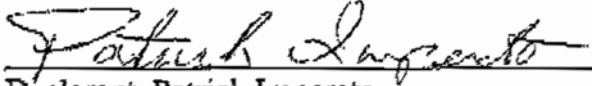
7. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: torn meniscus in my left knee that later required surgery to repair. Attached as Exhibit C to this Declaration is a true and correct copy of my select relevant medical records

related to the treatment that I received for my knee injury following the September 11, 2001 terrorist attacks. Dr. William A. Law performed my left knee surgery to repair my torn meniscus on December 17, 2001.

8. I further suffered, and continue to suffer, severe emotional distress as a result of these terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to these traumatic events. The horrific events that I witnessed on 9/11 directly caused all of the above conditions, which continue to this day.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 30 day of March, 2021.


Declarant, Patrick Imperato

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(ECF No.
5716)**